

Howard D. Olinsky  
OLINSKY LAW GROUP  
300 S. State Street, Ste 420  
Syracuse, NY 13202  
Ph: 315-701-5780  
Fax: 315-701-5781  
Email: holinsky@windisability.com

Hal Taylor  
223 Marsh Avenue  
Reno, NV 89509  
775-825-2223  
Fax: 775-329-1113  
Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

Attorneys for Plaintiff

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
ROYA MASSOUMI, CSBN 242697  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 977-8957  
Facsimile: (415) 744-0134  
E-Mail: Roya.Massoumi@SSA.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THERESA M. WEESNER,

Plaintiff,

v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

)  
) Case No. 2:16-cv-02018-RFB-PAL

) **JOINT STIPULATION AND [PROPOSED]**  
) **ORDER FOR EXTENSION OF TIME TO FILE**  
) **DEFENDANT'S NOTICE OF VOLUNTARY**  
) **REMAND OF THE CASE OR CROSS-**  
) **MOTION TO AFFIRM**

)  
) **(First Extension Request)**

1 Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting  
2 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an  
3 extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To  
4 Affirm by thirty days from the current deadline of January 6, 2017 to **February 6, 2017**, with all other  
5 dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly. This  
6 is Defendant's first request for an extension.

7  
8 Good cause exists to grant Defendant's request for extension. Defendant respectfully requests  
9 additional time to adequately review the record, assess and evaluate Plaintiff's arguments. Good cause  
10 also exists because counsel for Defendant (Counsel) was on scheduled leave for the holidays and is  
11 also expected to be out of the office from December 30, 2016 to January 3, 2017. Counsel needs  
12 additional time due to workload issues and current scheduling conflicts to properly respond to the  
13 issues Plaintiff raised in her Motion.

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Defendant makes this request in good faith with no intention to unduly delay the proceedings.  
Plaintiff has no objection and has stipulated to the requested relief.

Respectfully submitted this 29<sup>th</sup> day of December 2016,

Date: December 29, 2016

By: /s/\*Howard Olinsky  
Howard D. Olinsky  
\*by email authorization on 12/27/16  
Attorney for Plaintiff

Date: December 29, 2016

DANIEL G. BOGDEN  
United States Attorney  
HOLLY A. VANCE  
Assistant United States Attorney

By: /s/ Roya Massoumi  
ROYA MASSOUMI  
Special Assistant United States Attorney


Of Counsel:  
TINA L. NAICKER  
Assistant Regional Counsel  
Attorneys for Defendant

**[PROPOSED] ORDER**

For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before **February 6, 2017**. All other deadlines shall be extended accordingly.

**IT IS SO ORDERED.**

Dated: December 30, 2016

  
THE HONORABLE PEGGY A. LEEN  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I, ROYA MASSOUMI, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM** on the date and via the method of service identified below:

**CM/ECF:**

Howard D. Olinsky  
Olinsky Law Group  
300 S. State Street  
Ste 420  
Syracuse, NY 13202  
315-701-5780  
Fax: 315-701-5781  
Email: [holinsky@windisability.com](mailto:holinsky@windisability.com)

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775-825-2223  
Fax: 775-329-1113  
Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

Respectfully submitted this 29th day of December 2016,

/s/ Roya Massoumi  
ROYA MASSOUMI  
Special Assistant United States Attorney

OF COUNSEL:  
TINA L. NAICKER  
Assistant Regional Counsel, Region IX